

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA, :

Plaintiff, : CASE NO. 2:20-MJ-288

v. : MAGISTRATE JUDGE JOLSON

LEATHA INEZ SAVAGE, :

Defendant. :

**MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant, Leatha Inez Savage, through undersigned counsel, respectfully moves the court for an order to modify Defendant's conditions of release that were set on April 20, 2020, in the above-referenced case. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully submitted,

/s/ **Samuel H. Shamansky**  
SAMUEL H. SHAMANSKY  
Ohio Supreme Court No. 0030772  
523 South Third Street  
Columbus, Ohio 43215  
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Counsel for Defendant

**MEMORANDUM**

Following her initial appearance, Counsel for Defendant requests a modification of the court's conditions of release. Defendant has complied with every condition of the court. Defendant desires to have her trial travel limitation expanded to the Continental United States. Assistant United States Attorney Sheila Lafferty is not opposed to this request.

Respectfully submitted,

**/s/ Samuel H. Shamansky**  
SAMUEL H. SHAMANSKY  
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Counsel for Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed with the Clerk of Court for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of such filing to Assistant U.S. Sheila Lafferty, 303 Marconi Boulevard, Suite 200, Columbus, Ohio 43215, on July 29, 2021.

**/s/ Samuel H. Shamansky**  
SAMUEL H. SHAMANSKY